

Judge Marc L. Barreca
Hearing Location: Room 7106
700 Stewart St., Seattle, WA 98101
Hearing date: September 13, 2013
Hearing time: 9:30 a.m.

UNITED STATES BANKRUPTCY COURT FOR
THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

IN RE:) CHAPTER 7
ADAM GROSSMAN,) CASE NO. 10-19817
)
) TRUSTEE'S REPLY TO RESPONSES OF
) ABRAHAM J. WYNER TO TRUSTEE'S
) OBJECTION TO HIS CLAIM NO. 34-1
)
Debtor.)
)

COMES NOW Ronald G. Brown, the trustee in the above entitled case, through his undersigned attorney, and submits this reply to the response of Abraham J. Wyner to the Trustee's objection/motion to his Claim No. 34-1. The response is hereinafter called, the "Response".

In the Response,. Mr. Wyner fails to address the issue raised in the Trustee's objection/motion as to whether he has custody or possession of the original note; and he has not substantiated the authenticity thereof. Mr. Wyner is a scheduled creditor to whom notice of the Debtor's bankruptcy as well as the February 14, 2012 claims bar date was sent. ECF Docket Nos. 15 and 284. Mr. Wyner's lien claim was avoided on March 21, 2012 [Adv. Pro. 11-01954 Docket No. 64]. A copy of the judgment avoiding Mr. Wyner's claim was sent to him on March 23, 2012. Yet, Mr. Wyner did not file his Claim No. 34-1 until August 23, 2012. Mr. Wyner makes various statements and allegations which the Trustee does not believe is either relevant, germane or material to the issues presented on his objection/motion in regard to Claim No. 34-1 and thus does not reply thereto herein. The Trustee

TRUSTEE'S REPLY- 1

KRIEGMAN LAW OFFICE, PLLC
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Seattle, WA 98101
(206) 903-0344

1 believes that Mr. Wyner has failed to cure the deficiencies of Claim No. 34-1. Therefore, the Trustee
2 believes that the Court should enter an order disallowing Claim No. 34-1.

3 DATED this 10th day of September, 2013

4 KRIEGMAN LAW OFFICE, PLLC

5
6 /s/ Bruce P. Kriegman

7 Bruce P. Kriegman, WSBA #14228

8 Attorney for Trustee

9
10 **PROOF OF SERVICE**

11 I hereby certify that on September 10, 2013 I caused a true and correct copy of the foregoing to
12 be served upon Abraham Wyner at his e-mail address of ajw@wharton.upenn.edu.

13 DATED this 10th day of September, 2013

14
15 /s/ Bruce P. Kriegman

16 Bruce P. Kriegman